

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JENNIFER OSSOLA, JOETTA	) Case No. 1:13-cv-04836
CALLENTINE and SCOTT DOLEMBIA, on	)
behalf of themselves and all others similarly	)
situated,	)
	)
Plaintiffs,	)
	)
vs.	)
	)
AMERICAN EXPRESS COMPANY,	) Hon. Judge John Z. Lee
AMERICAN EXPRESS CENTURION BANK,	) Hon. Mag. Judge Jeffrey Cole
AND WEST ASSET MANAGEMENT, INC.	)
	)
Defendants.	)

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE MOTIONS FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENTS IN EXCESS OF FIFTEEN PAGES**

Plaintiffs respectfully move the Court for leave to file their Motions for and Memorandums in Support of Final Approval with Respect to the Telemarketing Settlement and Debt Collection Settlement in excess of the fifteen-page limit imposed under Rule 7.1 of the Local Rules of the United States District Court for the Northern District of Illinois. Specifically, Plaintiffs requests leave to file a motion of no more than 19 pages with Respect to the Telemarketing Settlement, and a motion of no more than 20 pages with Respect to the Debt Collection Settlement, and in support states as follows:

1. On July 6, 2016, the Court granted preliminary approval to the class action settlement entered into between Plaintiffs Ossola and Dolemba and Defendants American Express Company and American Express Centurion Bank (collectively, "American Express") and West Asset Management, Inc. ("West"), as to autodialed or prerecorded voice debt

collection calls allegedly made by West on behalf of American Express to the cell phones of Plaintiff and others in violation of the Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227. This Order set a deadline for Plaintiffs to file a motion for final approval of November 16, 2016. Dkt. No. 358 at 26.

2. On July 6, 2016, the Court granted preliminary approval to the class action settlement entered into between Plaintiff Callentine and Defendants American Express Company and American Express Centurion Bank (collectively, “American Express”), as to autodialed or prerecorded voice telemarketing calls allegedly made on behalf of American Express by its vendor Alorica, Inc. to the cell phones of Plaintiff and others in violation of the Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227. This Order set a deadline for Plaintiff to file a motion for final approval of November 16, 2016. Dkt. No. 357 at 26.

3. L.R. 7.1 limits the number of pages to a brief to 15 pages without prior approval of the Court, and Plaintiffs respectfully request leave to exceed this page limit in relation to their motions for final approval. An enlargement of this page limitation is necessary to allow Plaintiffs to fully describe the legal and factual basis supporting their motions, given the extended history of this case and the numerous factors relevant to final approval analysis in class action settlements in this Circuit.

4. These motions will comport with Local Rule 7.1’s requirement that briefs in excess of fifteen pages include a table of contents and a table of authorities.

5. Defendants’ Counsel do not oppose the relief sought herein.

WHEREFORE, Plaintiffs respectfully request that the Court grant leave for to file Plaintiffs Ossola and Dolemba’s Motion for Final Approval of Class Action Settlement and Plaintiff Callentine’s Motion for Final Approval of Class Action Settlement in excess of the

fifteen page limit imposed under Rule 7.1, up to and including 20 pages exclusive of cover sheet, tables, signature page, certificate of service and exhibits.

Dated: November 16, 2016

Respectfully Submitted,

By: s/ Keith J. Keogh

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